

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-01789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Substantively
Consolidated SIPA Liquidation of Bernard L. Madoff
Investment Securities LLC and Bernard L. Madoff,

Plaintiff,

v.

Stanley Shapiro, *et al.*,

Defendants.

Adv. Pro. No. 10-05383 (SMB)

**[PROPOSED] STIPULATED ORDER
TO EXTEND DEADLINE FOR DEFENDANTS TO COMPLY WITH THE COURT'S
ORDER COMPELLING THE PRODUCTION OF DOCUMENTS**

The plaintiff, Irving H. Picard (“the Trustee”), as trustee for the liquidation of Bernard L. Madoff Investment Securities LLC under the Securities Investor Protection Act, 15 U.S.C. §§ 78aaa *et seq.*, and the substantively consolidated estate of Bernard L. Madoff under chapter 7 of the United States Bankruptcy Code, 11 U.S.C. §§ 701 *et seq.*, and the defendants, Stanley Shapiro, David Shapiro, Leslie Citron, and Kenneth Citron (collectively, “Defendants,” and

together with the Trustee, the “Parties”), by and through their undersigned attorneys, submit this Stipulated Order and state as follows:

WHEREAS, on June 6, 2018, the Court entered an Order on Trustee’s Motion to Compel Production of Documents from Defendants Stanley Shapiro, David Shapiro, Leslie Citron, and Kenneth Citron. ECF Doc. No. 105 (the “Order”);

WHEREAS, in the Order, the Court required Defendants, within thirty (30) days of the entry of the Order, to provide either or both the Court and the Trustee with certain items and documents; and

WHEREAS, Defendants seek an additional seven (7) days to provide either or both the Court and the Trustee with said items and documents, and the Trustee has no objection to providing Defendants with the additional time to comply with their obligations under the Order;

IT IS HEREBY STIPULATED by the Parties and **SO ORDERED** by the Court as follows:

1. Defendants shall have seven (7) additional days, up to and including July 13, 2018, to comply with their obligations under the Order.

[SIGNATURES OF COUNSEL FOLLOW ON NEXT PAGE]

Respectfully submitted,

/s/ James H. Rollinson

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*Attorneys for Irving H. Picard, Trustee for
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Liquidation of Bernard L. Madoff
Investment Securities LLC and the Estate
of Bernard L. Madoff*

Dated: July __, 2018
New York, New York

Respectfully submitted,

/s/ Barry R. Lax

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*Attorneys for Stanley Shapiro, S&R
Investment Co., and the Estate of Renee
Shapiro*

HONORABLE STUART M. BERNSTEIN
UNITED STATES BANKRUPTCY JUDGE